



United States Government

Department of Energy

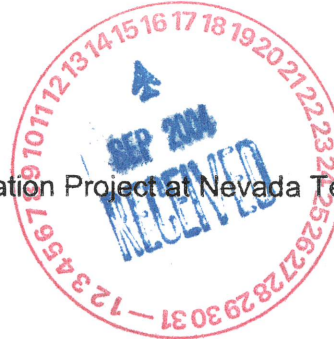
memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: SEP 15 2004

REPLY TO
ATTN OF: CBFO:NTP:KWW:VW:04-1981:UFC:5822

SUBJECT: Annual Recertification of Central Characterization Project at Nevada Test Site (A-04-04 and S-04-11)

TO: Kathleen A. Carlson, NVOO
Steven Warren, General Manager, WTS

The Carlsbad Field Office (CBFO) has completed the annual recertification audit and surveillance of the Central Characterization Project (CCP) TRU waste program deployed at the Nevada Test Site (NTS). Audit A-04-04 was conducted in Carlsbad, New Mexico on October 6-9, 2003 and surveillance S-04-11 was conducted at the NTS on August 3-4, 2004. The audit team determined that the CCP technical and quality assurance programs remain in compliance with the "Waste Analysis Plan" (WAP) of the *WIPP Hazardous Waste Facility Permit* (HWFP), the *Quality Assurance Program Document* (QAPD), the *CH Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant* (WIPP CH-WAC), the *TRUPACT-II Authorized Methods for Payload Control* (TRAMPAC) and other CBFO requirements and standards. The audit team determined that all processes were implemented effectively.

Based on the results of audit A-04-04 and surveillance S-04-11, the CBFO is continuing the CCP authority for certification and characterization of contact-handled debris waste at the NTS. Transportation was audited during Audit A-04-01 at the Savannah River Site on October 21-24, 2003 and found to be adequate and effectively implemented. See the attachments to this memorandum for the complete lists of certified processes, procedures, documents, and systems.

TRU waste characterization, certification, or transportation using significantly revised or new processes, procedures, or systems must be evaluated by the CBFO prior to implementation.



R. Paul Detwiler
Acting Manager

Attachments

040926



Kathleen Carlson
Steve Warren

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cc: w/attachments
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CTAC Document Coordinator
WIPP Operating Record
CBFO M&RC

*ED denotes Electronic Distribution

CENTRAL CHARACTERIZATION PROJECT AT NEVADA TEST SITE CERTIFICATION PROGRAM STATUS

The CBFO Director of the Office of Characterization and Transportation and the CBFO Quality Assurance Manager have evaluated the documentation supporting the compliance of the CCP TRU waste program deployed at the NTS. Based on the results of Audit A-04-04 conducted in Carlsbad, New Mexico on October 6-9, 2003 and Surveillance S-04-11 conducted at the Nevada Test Site on August 3-4, 2004, the recommendation to the CBFO Manager is that authority be continued for CCP certification and characterization of contact-handled debris waste at the NTS. The following processes are currently approved for contact-handled debris (S5000) waste:

- Acceptable knowledge
- Data verification and validation
- Headspace gas sampling and analysis
- Non-destructive assay using a segmented gamma scanner
- Real-time radiography (RTR)
- Visual examination (VE) as a QC check on RTR or VE in lieu of RTR
- WIPP Waste Information System interface

CCP Transportation was audited during Audit A-04-01 at the Savannah River Site on October 21-24, 2003. Transportation was found to be adequate and effectively implemented.

Attachments 2 and 3 contain complete lists of all certified procedures and equipment used by the CCP for the activities at NTS.

STATUS

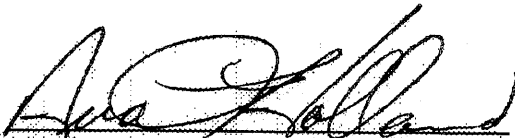
- All program elements remain complete.
- The following site documents are current and demonstrate how the CCP complies with the CBFO requirements.
 - ❑ **QAPJP – CCP-PO-001, Revision 8** - *CCP Transuranic Waste Characterization Quality Assurance Project Plan* (Approved March 15, 2004 – CBFO:NTP:RMK:VW:04-1075:UFC-5900)
 - ❑ **WCP – CCP-PO-002, Revision 9** - *CCP Transuranic Waste Certification Plan* (Approved March 15, 2004 - CBFO:NTP:RMK:VW:04-1074:UFC-5900)
 - ❑ **QAP** - Section 4.0 of CCP-PO-002
 - ❑ **TRAMPAC – CCP-PO-003, Revision 6**, *CCP TRUPACT-II Authorized Method for Payload Control* (Approved June 8, 2004 – CBFO:NTP:KWW:JGW:04-1480:UFC-5822)
 - ❑ Certified Systems - see attachment 2 for the complete list of certified systems used by the CCP at the NTS
 - ❑ Standard operating procedures - see attachment 3 for the complete list of certified CCP procedures used at the NTS

- CCP participated in the following performance demonstration programs (PDPs):
 - **NDA PDP** - Participation is current and satisfactory for the SGS system in:
 - Cycle 9A (CBFO:NTP:MRB:VW:02-3042:UFC:5822) dated October 7, 2002
 - Cycle 10A - (CBFO:NTP:MRB:IW:03-3087:UFC:5822) dated September 15, 2003.
 - Cycle 11A - CBFO granted an extension for NTS participation (CBFO:NTP:MB:JGW:04-1904:UFC:5822).
 - **HSG PDP** – Participation is current and satisfactory for the following:
 - Cycle 17A for the analysis of VOCs using the GC/MS Unit A, 2000-4368598 (CBFO:NTP:MRB:VW:04-0215:UFC:5822) dated January 6, 2004.
 - Cycle 18A for the analysis of VOCs for GC/MS Unit B, Sat2000-28461675 (CBFO:NTP:MB:JGW:04-1678:UFC:5822) dated August 2, 2004.
- CBFO conducted the recertification audit (A-04-04) October 6-9, 2003 and issued the report to NTS and the CCP on November 10, 2003. The CCP TRU waste program activities at NTS were determined to be in compliance with CBFO requirements. Surveillance S-04-11 was conducted at the NTS August 3-5, 2004 and the report issued, and copied to NMED, on August 11, 2004.
- The Final Audit Report was issued to NMED on January 14, 2004. A revised report and responses to NMED comments was issued on July 23, 2003. The NMED approved the Final Audit Report/Surveillance on August 27, 2004.
- The EPA did not participate in the recertification audit.
- Two CARs were issued as a result of A-04-04 and successfully closed on December 16, 2003.

RECOMMENDATION

The recommendation to the CBFO Manager is to continue the CCP authority for certification, characterization, and transportation of contact-handled debris waste located at the NTS. Attachments 2 and 3 list the systems and procedures that constitute the bounds of this authority.

CONCURRENCE



Ms. Ava L. Holland, Manager
CBFO Quality Assurance

9/13/04
Date



Mr. Kerry W. Watson, Director
CBFO Office of Characterization and Transportation

9/14/04
Date

CENTRAL CHARACTERIZATION PROJECT LIST OF CERTIFIED EQUIPMENT AT NTS

WIPP WWIS #	Site Equipment # or Title	Description	Components	Software
Headspace Gas				
7HG1	NUCFIL HSG Units A & B	<p>NUCFIL headspace gas system – VOCs and hydrogen and methane analysis</p> <p>➤ PDP Cycle 17A = Unit A, 2000-43685698 (01/06/04)</p> <p>➤ PDP Cycle 18A = Unit B, Sat2000-28461675 (08/02/04)</p> <p>Operating Procedure CCP-TP-007</p>	<p>Analytical system consisting of:</p> <ul style="list-style-type: none"> <input type="checkbox"/> (2) GC/MS GC/MS interface <input type="checkbox"/> Flame ionization detector (FID) <input type="checkbox"/> Thermal conductivity detector <input type="checkbox"/> Vacuum pumps <p>Drum sampling/venting system consisting of:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Drum cabinet <input type="checkbox"/> Glove box <input type="checkbox"/> Air filtration system <input type="checkbox"/> Power head subassembly <input type="checkbox"/> PLC controller 	<ul style="list-style-type: none"> <input type="checkbox"/> Saturn GC/MS Workstation NUCFIL <input type="checkbox"/> Programmable logic control software <input type="checkbox"/> HSG spreadsheet test (UCL₉₀) calculations <input type="checkbox"/> Batch Data Report template
Non-destructive Assay				
7SG1	MCS SGS	<p>Mobile Characterization Systems (MCS) Segmented Gamma Scanner</p> <p>➤ Cycle 9A at NTS = SGS NV-01, Group NV-G1</p> <p>➤ Cycle 10A at Hanford = SGS HA05/HAG3</p> <p>Operating Procedure CCP-TP-051</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Assay chamber with motor driven turntable <input type="checkbox"/> Ba 133 gamma ray transmission source <input type="checkbox"/> SeGe and LeGe detectors <input type="checkbox"/> Analysis equipment <input type="checkbox"/> Drum Conveyor System with jib crane 	<ul style="list-style-type: none"> <input type="checkbox"/> Canberra Can Scanner
Non-destructive Examination				
7RR1	MCS RTR-5	<p>Real-time Radiography Mobile Characterization System's RTR-5 [built by VJ Technologies] – 55 gallon drums</p> <p>Operating Procedure CCP-TP-045</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Shielded x-ray enclosure with a hydraulic drum loading door and manually opened personnel door <input type="checkbox"/> Conveyor cart including drum manipulation equipment <input type="checkbox"/> X-ray imaging system including x-ray tube, image intensifier, and video camera <input type="checkbox"/> Video/audio recording equipment <input type="checkbox"/> Mobile platform 	

**CENTRAL CHARACTERIZATION PROJECT
LIST OF CERTIFIED PROCEDURES AT NTS**

No.	Procedure Number/Rev	DOCUMENT TITLE
1.		Bechtel Nevada, NTS Statement of Work for Characterization of NTS TRU Waste
2.	CCP-PO-001	CCP Transuranic Waste Quality Assurance Project Plan
3.	CCP-PO-002	CCP Transuranic Waste Certification Plan
4.	CCP-PO-003	CCP TRUPACT-II Authorized Methods for Payload Control
5.	CCP-PO-005	CCP Conduct of Operations
6.	CCP-PO-006	CCP Conduct of Operations Matrix
7.	CCP-PO-008	CCP CCP Quality Assurance Interface with WTS QA Program
8.	CCP-PO-009	CCP/NTS Interface Document
9.	CCP-QP-001	CCP Graded Approach
10.	CCP-QP-002	CCP Training and Qualification Plan
11.	CCP-QP-004	CCP Corrective Action Management
12.	CCP-QP-005	CCP TRU Nonconforming Item Reporting and Control
13.	CCP-QP-006	CCP Corrective Action Reporting and Control
14.	CCP-QP-008	CCP Records Management
15.	CCP-QP-009	CCP Work Control Process
16.	CCP-QP-010	CCP Document Preparation and Approval
17.	CCP-QP-011	CCP Notebooks & Logbooks
18.	CCP-QP-015	CCP Procurement
19.	CCP-QP-016	CCP Control of Measuring, Testing, and Data Collection Equipment
20.	CCP-QP-017	CCP Identification and Control of Items
21.	CCP-QP-018	CCP Management Assessments
22.	CCP-QP-019	CCP Quality Assurance Reporting to Management
23.	CCP-QP-021	CCP Surveillance Program
24.	CCP-QP-022	CCP TRU Software Quality Assurance
25.	CCP-QP-023	CCP Handling, Storage, and Shipping
26.	CCP-QP-026	CCP Inspection Control
27.	CCP-QP-027	CCP Test Control
28.	CCP-QP-028	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
29.	CCP-QP-030	CCP Written Practice for the Qualification of CCP Helium Leak Detection Personnel (Certified in A-04-01)
30.	CCP-TP-001	CCP Project Level Data Validation and Verification
31.	CCP-TP-002	CCP Reconciliation of DQOs and Reporting Characterization Data
32.	CCP-TP-003	CCP Sampling Design and Data Analysis for RCRA Characterization
33.	CCP-TP-005	CCP Acceptable Knowledge Documentation
34.	CCP-TP-007	CCP Single Sample Manifold Headspace Gas Sampling and Analysis Procedure
35.	CCP-TP-009	CCP Single Sample Manifold Data Handling Procedure
36.	CCP-TP-028	CCP Radiographic Test and Training Drum Requirements
37.	CCP-TP-029	CCP Single-Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration
38.	CCP-TP-030	CCP WWIS Data Entry and TRU Waste Certification
39.	CCP-TP-032	CCP Single Sample Manifold Data Validation Procedure
40.	CCP-TP-033	CCP Shipping of CH TRU Waste (Certified in A-04-01)
41.	CCP-TP-041	CCP Preparing and Handling Waste Drum for Visual Examination
42.	CCP-TP-045	CCP RTR #5 Radiography Inspection Operating Procedure
43.	CCP-TP-050	CCP Mobile Segmented Gamma Scanner Calibration Procedure
44.	CCP-TP-051	CCP Mobile Segmented Gamma Scanner Operation
45.	CCP-TP-052	CCP Mobile Segmented Gamma Scanner Data Reviewing, Validating, and Reporting
46.	CCP-TP-054	CCP Adjustable Center of Gravity Lift Fixture Preoperational Checks and Shutdown (Certified in A-04-01)
47.	CCP-TP-055	CCP Varian Porta-Test Leak Detector Operations (Certified in A-04-01)
48.	CCP-TP-056	CCP HSG Performance Demonstration Plan
49.	CCP-TP-058	CCP NDA Performance Demonstration Plan

No.	Procedure Number/Rev	DOCUMENT TITLE
50.	CCP-TP-061	CCP TRU Waste Container Inspection and Control at NTS
51.	CCP-TP-062	CCP TRU Waste Visual Examination, Segregation, and Repacking at the NTS WEF
52.	CCP-TP-086	CCP TRUPACT-II Shipping Payload Assembly (Certified in A-04-01)

DEACTIVATED PROCEDURES

#	Deactivated Procedure #	Deactivated Procedure Title	Date Deactivated
1.	CCP-QP-013	CCP QAPD Matrix	03/19/2003
2.	CCP-QP-020	CCP Independent Assessments	8/19/2002
3.	CCP-QP-024	CCP Certification of CCP Audit Personnel	8/19/2002

